

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

HEALTH ALLIANCE)	
MEDICAL PLANS, INC.,)	
)	
Plaintiff,)	Case No. 20-565
)	
v.)	Judge Campbell-Smith
)	
THE UNITED STATES,)	
)	
Defendant.)	
)	
)	

JOINT STATUS REPORT

Pursuant to the Court's September 22, 2021 Order (ECF No. 18) the parties respectfully submit this Joint Status Report.

This case is currently stayed because the Government is working with a number of CSR plaintiffs to determine whether they may efficiently resolve this matter without further litigation or at least streamline these cases. On September 22, 2021, the Court continued the stay until further order of the Court, and ordered the parties to file a joint status report on November 4, 2021, and then every 30 days. ECF No. 18.

The parties believe that the current continued stay in this case will provide more time for the broader discussions about possible approaches to resolving this and other CSR cases. Counsel for the Government has advised that it plans to meet with CMS representatives on Monday, April 4, 2022 to discuss the Government's substantive response to the CSR Plaintiffs' proposed settlement methodology for CSR damages owed for benefit years 2018 and beyond. The Government hopes to provide the CSR Plaintiffs with a substantive response soon after this meeting. The parties thus respectfully request that the Court continue the stay in this case.

Dated: April 4, 2022

s/ Stephen McBrady

Stephen McBrady

CROWELL & MORING LLP

1001 Pennsylvania Avenue, NW Washington, DC
20004

Telephone: (202) 624-2500

Facsimile: (202) 628-5116

SMcBrady@crowell.com

OF COUNSEL:

Charles Baek

CROWELL & MORING LLP

1001 Pennsylvania Avenue, NW

Washington, DC 20004

Counsel for Plaintiff

Respectfully submitted,

BRIAN M. BOYNTON

Principal Deputy Assistant Attorney General

PATRICIA M. McCARTHY

Director

s/Claudia Burke

CLAUDIA BURKE

Assistant Director

s/ Albert S. Iarossi

ALBERT S. IAROSSI

Trial Attorney

Civil Division

U.S. Department of Justice

P.O. Box 480

Ben Franklin Station

Washington, D.C. 20044

Telephone: (202) 616-3755

Email: Albert.S.Iarossi@usdoj.gov

OF COUNSEL:

DAVID M. KERR

Trial Attorney

Counsel for Defendant